

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**TODD TARGGART, individually and on
behalf of all others similarly situated,**

Plaintiff,

v.

**NEXT BRIDGE HYDROCARBONS, INC.,
et al.,**

Defendants.

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Case No. 4:24-cv-00767-P

**DEFENDANTS' MOTION TO DISMISS
PLAINTIFFS' AMENDED COMPLAINT WITH PREJUDICE**

Defendants Next Bridge Hydrocarbons, Inc., Robert L. Cook, Clifton Dubose, Jr., Joseph DeWoody, Lucas T. Hawkins, Delvina Oelkers, Mia Pitts, Kristin Whitley, and Gregory McCabe (collectively, "Defendants"), by and through their undersigned attorneys, move to dismiss with prejudice Plaintiffs Todd Targgart, Mohammed Limon, and Steven Martinez (collectively, "Plaintiffs")'s Amended Complaint under Federal Rule of Civil Procedure 12(b)(1) and (b)(6).

Under Local Rule 7.1, this motion is supported by a brief and appendix setting forth Defendants' contentions of law, arguments, and authorities, which are filed contemporaneously with this motion. For the reasons set forth in the accompanying brief and appendix, Defendants respectfully request that the Court (1) grant Defendants' Motion to Dismiss Plaintiffs' Amended Complaint WITH PREJUDICE, and (2) grant Defendants such other and further relief, at law and in equity, to which they are justly entitled.

Dated: October 23, 2024

Respectfully submitted,

/s/ David J. Drez III

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was served on all counsel of record on October 23, 2024, through the Court's CM/ECF system.

/s/ David J. Drez III

David J. Drez III